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Enterprise Rent-A-Car, states as follows:

- Complaint re

6. That on April 27, 2010, the plaintiff, Elsa Collazo, was a passenger in a trolley owned by defendant, Enterprise Holdings, Inc. d/b/a Enterprise Rent-A-Car (hereinafter "Enterprise").

7. That at said time, the Enterprise trolley was driven by an employee and/or agent of the defendant, Enterprise, and traveling on the expressway in Carolina, Puerto Rico.

8. That it was the duty of the defendant, through its employees, to use reasonable care in the maintenance and operation of its trolley so as not to cause injury and damage to others.

9. That the defendant is vicariously liable for any damages caused by the negligent acts of its employees under the doctrine of respondeat superior.

10. That at said place and time, the law of Puerto Rico required Defendant's employee to require all passengers to use seat belts.

11. That at said place and time, the law of Puerto Rico required Defendant's vehicle to be equipped with passenger restraint systems.

12. That at said place and time, the Defendant's vehicle did not possess passenger restraint systems as required by law.

13. That at said place and time, the Plaintiff was not wearing a seatbelt because the Defendant's vehicle was not equipped with a seat belt as required by law.

14. That at said place and time, Defendant's trolley made a sudden stop causing Plaintiff to be partially ejected from her seat and injured.

13. As a direct and proximate result of the defendant's negligence and fault, the plaintiff was injured, some of which injuries may be permanent, incurred medical expenses, pain and suffering, mental anguish, and was otherwise damaged.

WHEREFORE, plaintiff prays for judgment against the defendant in a sum which will reasonably compensate her for her damages in excess of the jurisdictional minimum of this

Court, plus costs, including attorney's fees for any frivolously asserted affirmative defenses, interest and any other proper relief.

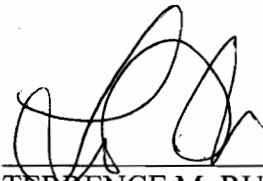


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TERRENCE M. RUBINO, #6220-45  
MICHAEL E. POLEN, JR., #25052-45  
RUBINO, RUMAN, CROSMER,  
SMITH, SERSIC & POLEN

**JURY DEMAND**

Comes now plaintiff, by counsel, and demands trial by jury.



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